SAN LORENZO VALLEY WATER DISTRICT
13060 Highway 9 • Boulder Creek, CA 95006-9119
Office (831) 338-2153 • Fax (831) 338-7986
Website: www.slvwd.com

August 7, 2015

California Department of Water Resources
Attn: Sustainable Groundwater Management Section
P.O. Box 942836
Sacramento, CA 94236

To Whom It May Concern:

Thank you for the opportunity to comment on the Draft Basin Boundary Emergency Regulations. The San Lorenzo Valley Water District is located in the mountainous region of Santa Cruz County. Sixty percent of the water delivered to residential customers is from aquifers within the Santa Margarita and Lompico Sandstones. These aquifers are shared between our District and Scotts Valley Water District, as well as several smaller water systems and a large number of private wells. As such, it is critical that the basin boundary regulations will be applicable to our shared aquifer, as we are in an area of overdraft concern and believe this area should be addressed by DWR as higher priority.

Within the boundaries of the San Lorenzo Valley and Scotts Valley water districts, DWR's Bulletin 118 update defined the Felton basin (no. 3-50) as a relatively small area of exposed alluvial deposits along the San Lorenzo River where no wells exist, and the Scotts Valley basin (no. 3-27) as a relatively small area of thin alluvial deposits in Camp Evers. These designations do not encompass the actual sandstone aquifers upon which the local communities rely (Fig. 1 attached).

The definition of the groundwater basin, as stated in the regulations, is limited and inconsistent with other references to groundwater basins in the Draft Regulations as follows:

- *A **groundwater basin** is defined as a three-dimensional alluvial aquifer, or a stacked series of alluvial aquifers, with reasonably well-defined boundaries in a lateral direction and a definable bottom.*

p. 5 of the draft regulations states that: "a groundwater basin *generally* refers to an alluvial aquifer or stacked series of alluvial aquifers with a minimum thickness of 25 feet, with reasonably well-defined boundaries in a lateral direction, based on features that significantly impede groundwater flow, and a definable bottom characterized by rock or sediment of low permeability or the base of fresh water" (emphasis added).

p. 14 of the draft regulations describes an aquifer as: “alluvium *or similar bodies of rock or sediment* that is sufficiently porous and permeable to store, transmit, and yield significant or economic quantities of groundwater to wells and springs.”

We at the San Lorenzo Valley Water District would like to make California’s 2014 Groundwater Sustainability Act work for us, beginning with a more accurate recognition of our actual groundwater basins (Fig. 2 attached). Please provide clarification that a basin can consist of permeable sandstone formations, such as the Santa Margarita and Lompico Sandstones. And please confirm that DWR will be responsive to our attempts to comply with the 2014 Act by revising our basin boundaries and submitting a Groundwater Sustainability Plan that will address critical local overdraft issues.

Sincerely,

Brian E. Lee
District Manager
San Lorenzo Valley Water District

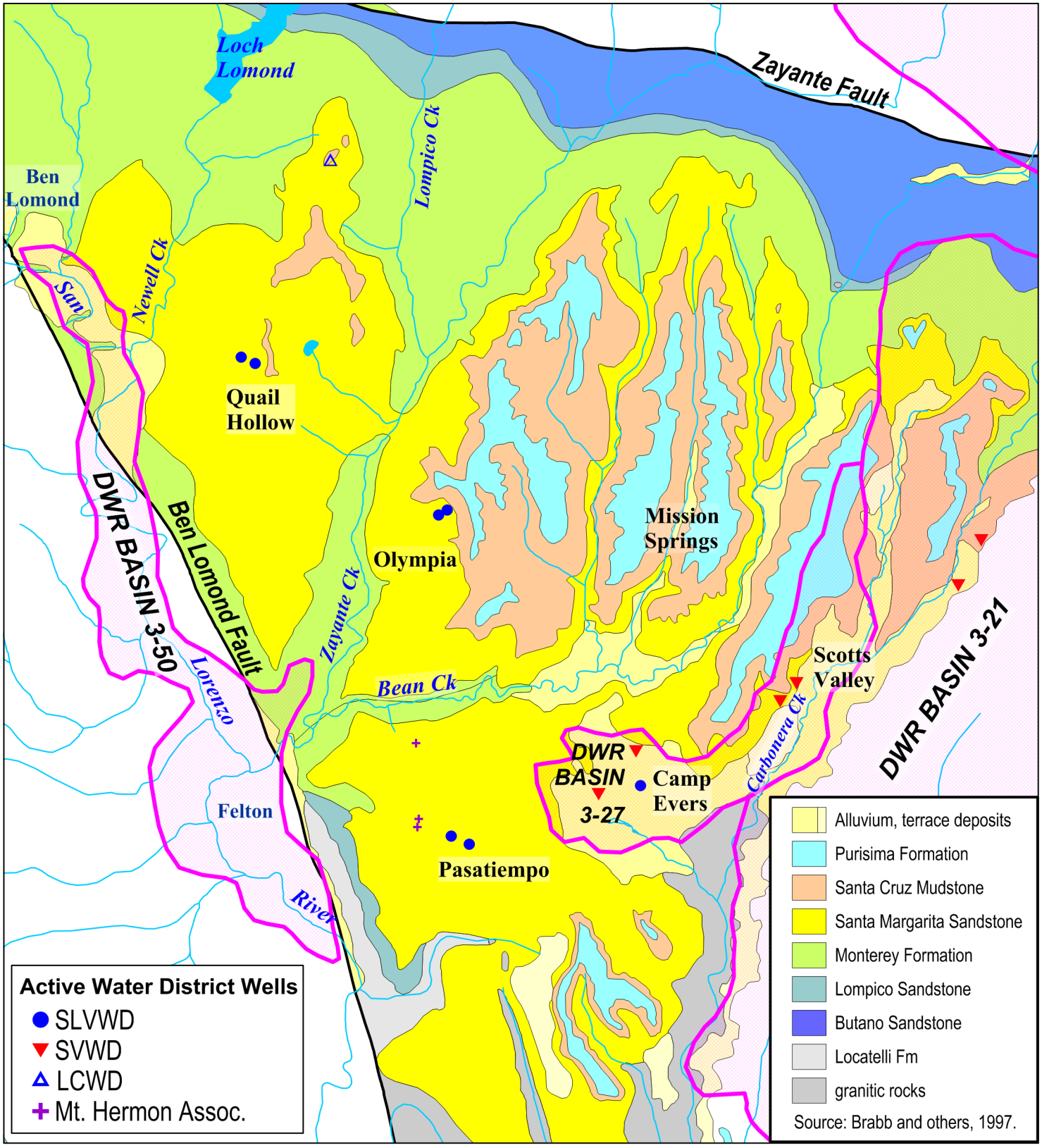

Figure 1
Comparison of DWR Bulletin 118 Basin Boundaries to Location of Actual SLVWD Production Wells

NM Johnson

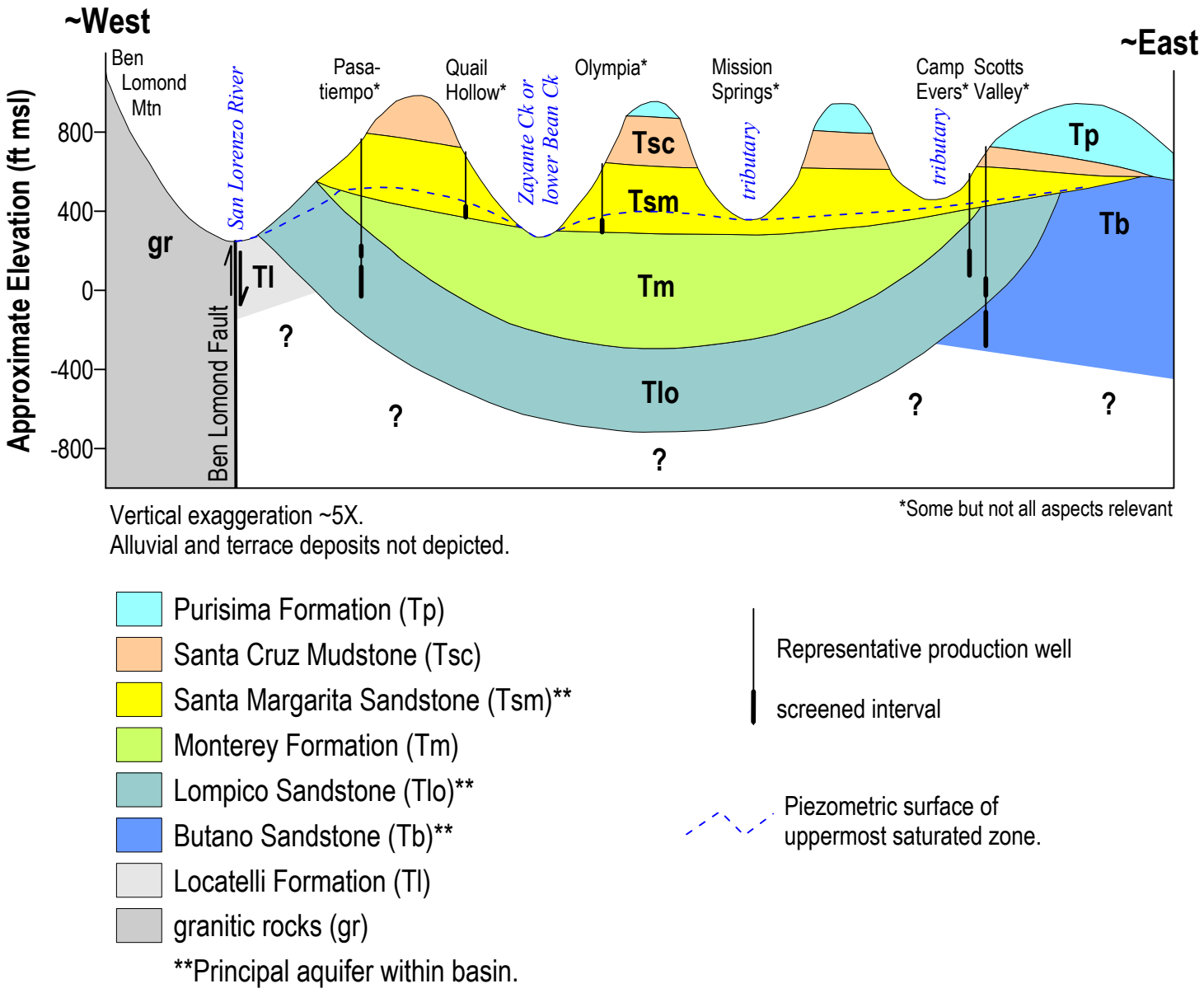

Figure 2
Schematic Geologic Cross Section of SLVWD Groundwater Source Areas

NM Johnson